

Rumrill, Nancy

From: Rumrill, Nancy
Sent: Monday, September 29, 2014 5:27 PM
To: Dan Johnson
Cc: Albright, David
Subject: Requesting a few items based on our review of September 11, 2014 submittal

Hi Dan,

Thank you for discussing the September 11, 2014 response with you today. Based on our review, the following items were missing or needing your clarification in the hard-copy or the electronic version of the Florence Copper permit application:

Attachment A, Area of Review: The contents of Exhibit 14B-2, Analytical Results & QA/AC Documentation, are not provided in the electronic version of the permit application. The table of contents states that the documents are provided on a CD, and the hard copy of the application includes paper copies of those documents. Please add those documents to the CD of the application.

Attachment P, Monitoring Program: All but the last two lines of text is missing on page 6. Please add the missing text to the electronic version.

Attachment Q, Plugging and Abandonment Plan, Exhibit Q-3: P&A plans for five coreholes and one monitoring well were provided but are not listed in Table C-1. The corehole numbers are 53s, 162s, 325s, 337s, and 338s and the well is M32-UBF. If those coreholes and well are located within 500 feet of the PTF well field, please add the required information to Table C-1 and add the drilling records to Attachment C of the application.

In addition, the P&A Plan form and schematic for the DM-B well were not found in the paper or CD version of the application. Please provide the paper copy for Exhibit Q-3 and include it in the CD application.

The BHP well P&A Plans and schematics show the liners being left in the wells and filling each well with cement from the bottom of the well to the surface. Please describe how cement will be placed from the bottom without removing the liners, or include a step to remove the liners before plugging the wells from top to bottom.

The PTF AOR well P&A Plans and schematics have the same deficiencies in the electronic version as the paper copies, as discussed with you today. That is, 7520-14 P&A plans are not signed or dated, MW-01 well form is not completed, the well locations are not shown on the map on the form, and the most of the well schematics lack cement plugs. Please correct those deficiencies in the electronic version and provide the paper copies.

Please provide the updated CD of the application and written response, where appropriate. Please let me know if you have any questions.

Thanks, Nancy

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